

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SUSAN SOLTANPOUR

Plaintiff(s),

FIRST SET OF
INTERROGATORIES

MARGUERITE ENDRIZZI

Defendant(s).

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S I R S:

PLEASE TAKE NOTICE that, pursuant to Rule 33 of the Federal Rules of Civil Procedure and Rule 46 of the United States District Court for the Southern District of New York, the Defendant, MARGUERITE ENDRIZZI, by her attorney, O'CONNOR, McGUINNESS, CONTE, DOYLE & OLESON, hereby requests that the plaintiff's answer, under oath, the following written interrogatories and requests for documents separately and fully in writing, within thirty (30) days from the date of service thereof. The answers hereto shall include all information known up to the date of verification thereof.

PLEASE TAKE FURTHER NOTICE, that each interrogatory and each sub-part of each interrogatory shall be accorded a separate answer. Interrogatories or sub-parts thereof shall not be combined for the purpose of supplying a common answer. The answer to an interrogatory or a sub-part thereof should not be supplied by referring to the answer to another interrogatory or sub-part thereof unless the interrogatory or sub-part referred to supplies a complete and accurate answer to the interrogatory or sub-part being answered.

PLEASE TAKE FURTHER NOTICE, that the foregoing are continuing interrogatories and, if any further information is obtained after responses to these interrogatories are served, the information is to be furnished to the undersigned in supplemental and/or amended responses.

INTERROGATORIES

1. State the date and hour of the accident.
2. State the exact place of the occurrence of the accident.
3. State the name of the street upon which and the direction in which it will be claimed each motor vehicle was proceeding at the time of the accident.
4. State the part or portion of each of the motor vehicles involved which came into contact with each other, or with plaintiffs.
5. State each and every act of negligence, either of omission or commission which it will be claimed was committed by the defendant, MARGUERITE ENDRIZZI, together with any specific ordinance or statute that will be claimed to have been violated.
6. State the nature, location, duration and extent of each and every injury claimed to have been sustained by the plaintiff, SUSAN SOLTANPOUR.
7. State particularly each injury claimed to be permanent, and in what respect it is claimed to be permanent.
8. State the length of time it is claimed the plaintiff, SUSAN SOLTANPOUR, was confined to each of the following:
 - (a) hospital;
 - (b) bed;
 - (c) at home.
9. State the amount of expenses which plaintiff, SUSAN SOLTANPOUR, claims to have incurred for:
 - (a) hospitals;
 - (b) physicians;
 - (c) nurses;
 - (d) all other.

10. State the length of time plaintiff, SUSAN SOLTANPOUR, was unable to attend to her usual business and the amount of wages or earnings claimed to have gone unpaid by her employer by reason of the occurrence; state the name and address of the employer, the nature of her employment and the amount of weekly or monthly earnings.
11. State the plaintiff's age, address and Social Security number.
12. State each item of damage claimed to plaintiff's motor vehicle, if any, together with an itemized statement of the cost of repair thereof; its description as to year, make and model; its claimed market value immediately prior to the accident and immediately thereafter; and the amount claimed, if any, for loss of use thereof.

Dated: White Plains, New York
December 6, 2007

Yours, etc.,

MONICA G. SNITILY
O'CONNOR, McGUINNESS, CONTE,
DOYLE & OLESON
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